

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:

Eleni Papakostas Cintron,

Debtor.

Case No. 19-33909

Chapter 13

Honorable David D. Cleary

NOTICE OF MOTION

TO: See attached Service List

PLEASE TAKE NOTICE that on April 12, 2021, at 1:30 PM, I will appear before the Honorable David D. Cleary, or any judge sitting in that judge's place, and present the motion of Caliber Home Loans, Inc. for Amendment of the entered agreed order, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 161 122 6457 and the password is Cleary644. The meeting ID and password can also be found on the judge's page on the court's web site, <https://www.ilnb.uscourts.gov/content/judge-david-d-cleary>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) businesses days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Caliber Home Loans, Inc.,

By: *Cheryl Considine*
Cheryl Considine
One of its attorneys

FAIQ MIHLAR (#6274089)
HEATHER M. GIANNINO (#6299848)
AMANDA J. WIESE (#6320552)
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CERTIFICATE OF SERVICE

I, Cheryl Considine, certify under penalty of perjury under the laws of the United States of America that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown or by the method indicated on the list on March 25, 2021, at 5:00 p.m.

Cheryl Considine

Cheryl Considine

SERVICE LIST

Service by Mail:

Eleni Papakostas Cintron
228 W Frontage Rd
Northfield, Illinois 60093

Jose Cintron Jr.
228 W Frontage Rd
Northfield, Illinois 60093

Service by Electronic Notice through ECF:

David H Cutler
Cutler & Associates, Ltd.
4131 Main Street
Skokie, IL 60076

Marilyn O. Marshall
224 S. Michigan, Suite 800
Chicago, IL 60604

Patrick S. Layng
United States Trustee (Region 11)
219 S. Dearborn Street Room 873
Chicago, IL 60604

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MOTION TO AMEND AGREED ORDER

NOW COMES Caliber Home Loans Inc., ("Movant") by and through its attorneys, Heavner, Beyers & Mihlar, LLC, and hereby moves this Court for an entry of an Amended Agreed Order resolving the Motion for Relief from the Automatic Stay and the Co-Debtor Stay executed by Movant and Debtor. In further support of this Motion, Movant respectfully states:

1. Debtor filed a petition under Chapter 13 of the United States Bankruptcy Code on November 29, 2019.
2. Movant filed its Motion for Relief from Automatic Stay and Co-Debtor Stay (hereinafter "Motion") on February 24, 2020.
3. The Motion was resolved pursuant to an Agreed Order entered on March 19, 2020.
4. The Debtor failed to make five post-petition payments and a Notice of Failure to Comply with the Agreed Order was filed on March 11, 2021.
5. The Debtor, through her attorney, proposed a plan to cure the default.
6. The Amended Agreed Order has been executed by Movant and Debtor.
7. Therefore, Movant and Debtor request that this court enter the Amended Agreed Order attached hereto as Exhibit "A".

WHEREFORE, Movant prays that this court enter the Amended Agreed Order to resolve the Motion for Relief from Automatic Stay and Co-Debtor Stay and for other relief as the court deems proper.

Caliber Home Loans Inc.,

By: *Cheryl Considine*

Cheryl Considine
One of its attorneys

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